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April 1, 2020

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
**Public Service Commission of South Carolina**  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

RE: Actions in Response to COVID-19  
Docket No. 2020-106-A

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporate and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans  
Docket No. 2017-370-E

Friends of the Earth and Sierra Club v. Dominion Energy South Carolina, Inc.  
Docket No. 2017-207-E

Request of the Office of Regulatory Staff for Rate Relief to Dominion Energy South Carolina, Incorporated's (f/k/a South Carolina Electric & Gas Company) Rates Pursuant to S.C. Code Ann. § 58-27-920 (See also Docket No. 2017-305-E)

Dear Ms. Boyd:

By Order No. 2018-804 dated December 18, 2018, issued in Docket Nos. 2017-207-E; 2017-305-E, and 2017-370-E, the Public Service Commission of South Carolina ("Commission") instructed Dominion Energy South Carolina, Inc ("DESC" or "Company") to file an electric general rate case no earlier than May 1, 2020, to ensure that actual merger savings are reflected in retail electric rates on a timely basis. *See* p.105 and Order Exhibit 1, p.9. Additionally, the Commission established the historical test period as the twelve-months ended December 31, 2019, updated for

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known and measurable changes as of September 30, 2020, with rates effective January 1, 2021. *Id.*<sup>1</sup>

DESC has instituted mitigation measures in response to the COVID-19 crisis for the benefit of its retail electric and natural gas customers by waiving late-payment charges, ceasing disconnections for non-payment, and waiving reconnection charges for those residential customers whose service had been disconnected for non-payment. See Docket Nos. 2020-105-EG and 2020-106-A. On March 13, 2020, Governor Henry Dargan McMaster declared a State of Emergency throughout the State of South Carolina in response to the COVID-19 crisis and has since issued multiple executive orders closing schools, postponing elections, prohibiting dining inside restaurants, prohibiting public and private gatherings of more than three people, requiring certain out-of-state visitors to isolate or self-quarantine, and invoking other emergency governmental powers under multiple statutes. See Executive Orders 2020-08 through 15.

During this difficult and uncertain time, DESC's efforts are focused on providing reliable electric and natural gas service to its customers and taking proactive steps to the limit spread of COVID-19. In furtherance of these causes and also being mindful of the current State of Emergency, DESC respectfully requests that the Commission issue an order extending the January 2021 deadline for new rates to take effect by sixty (60) days until March 8, 2021, which is the date of the Company's first billing cycle of March 2021. The issuance of such an order would be consistent with recent action taken by the Commission in response to the COVID-19 crisis. See Order No. 2020-259 issued in Docket Nos. 2019-281-S and 2020-106-A (granting stay for a period of sixty (60) days in a pending sewer service rate case proceeding and thanking the utility for agreeing to the stay as requested). Based upon the foregoing, good cause exists for the Commission to issue an order as

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<sup>1</sup> For background purposes, DESC's current retail electric rates and charges (exclusive of changes in the fuel component and the recovery of cost and revenues associated with demand side management and energy efficiency programs) were last approved by the Commission in Order No. 2012-951 in Docket No. 2012-218-E. Since this time, DESC's reasonable and necessary costs of operations have risen such that current rates and charges are no longer sufficient to allow the Company a reasonable opportunity to earn an adequate rate of return on its investment in its electric system and assets with which it serves customers. In Order No. 2012-951, the Commission found that 10.25% was a fair and reasonable return on the Company's common equity. For the adjusted test year ending December 31, 2019, the Company earned a 6.73% overall return on its retail electric operations and a 6.98% return on common equity.

requested above. *See also* Letter of Comer H. “Randy” Randall dated March 18, 2020, to certain leaders of the South Carolina General Assembly (requesting issuance of a Joint Resolution that would have the effect of delaying the filing of a future electric rate case and stating that two to six months is a reasonable period of time for delay).

If the Commission grants DESC’s request, then the Company will not be required to file its application before August 15, 2020. Moreover, the Company will maintain the historical test period as the twelve-months ended December 31, 2019; however, the Company requests permission to update its test period results for known and measurable matters as of November 30, 2020, and not as of September 30, 2020 as provided for in Order No. 2018-884 at page 105. These updates would be in addition to any other adjustments to the test year data made to reflect known and measurable out-of-period changes in expenses, revenues and investments as is required under historical test-period rate making. *See Parker v. S.C. Public Service Commission*, 280 S.C. 310, 312, 313 S.E. 2d 290, 292.

By copy of this letter, DESC is notifying the South Carolina Office of Regulatory Staff as well as the other parties of record of the Company’s request referenced above.

Thank you for your consideration of the Company’s request. If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



K. Chad Burgess

KCB/kms

cc: All parties of record in Docket No. 2020-106-A  
All parties of record in Docket No. 2017-370-E  
All parties of record in Docket No. 2017-305-E  
All parties of record in Docket No. 2017-207-E  
(all via electronic mail only)